

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Miguel A Baez, Sr.
Sophia Baez

Debtors

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Case no. 15-19362

Chapter 13

Judge: Donald R. Cassling

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Miguel A Baez, Sr.
Sophia Baez
2543 Prairieview Ln South
Aurora, IL 60502

David Cutler
4131 Main St
Skokie, IL 60076

Please take notice that on Friday, July 10, 2015 at 9:30 am, a representative of this office shall appear before the Honorable Judge Donald R. Cassling at the Kane County Courthouse, 100 S 3rd Street, Courtroom 240, Geneva, IL 60134 and present the motion set forth below.

I certify that this office caused a copy of this notice to be delivered to the above listed debtors by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on Wednesday, June 24, 2015.

/s/ Heather Barnette

For: Glenn Stearns, Trustee

OBJECTION TO DISCHARGE UNDER § 1328 (f)

Now comes Glenn Stearns, Chapter 13 Trustee, and requests that the discharge of the above referenced Debtors be denied and in support thereof, states the following:

1. On June 02, 2015, the debtors filed a petition under Chapter 13.
2. The Debtors received a discharge in a prior Chapter 7 case filed within the past four years or a prior Chapter 13 case filed within the past two years from the date of the filing of the present case.
3. The Debtors Are not entitled to a discharge under § 1328 (f).

WHEREFORE, the Trustee prays that the discharge for the above referenced debtors be denied.

Respectfully Submitted;

/s/ Carolyn A. Suzzi

For: Glenn Stearns, Trustee

Glenn Stearns, Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
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